



June 4, 2008

Via Email

Mr. Larry Prather, Assistant Director of Civil Works
HQUSACE, Attn: P&G Revision
CECW-ZA
441 G Street, NW
Washington DC 20314-1000

Dear Mr. Prather:

Thank you for the opportunity to comment on proposed revisions to the USACE Principles and Guidelines. The Surfrider Foundation is a non-profit grassroots organization dedicated to the protection and enjoyment of our world's oceans, waves and beaches. Founded in 1984 by a handful of visionary surfers in Malibu, California, the Surfrider Foundation now maintains over 50,000 members and 80 chapters worldwide. We are intimately involved with several Corps projects, primarily along the nation's coasts.

Review period and process

The limited process being undertaken by the Corps to solicit comments from the public and to involve water resources experts and practitioners in the revision of the Principles and Guidelines (P&G) is unacceptable. The significance of this opportunity to retool the management of the nation's water and coastal resources cannot be understated. This revision of the P&G needs to take advantage of the wealth of knowledge gained by the Corps, water resource practitioners at all levels of government, academia and NGO's. A much more thorough examination of the past successes and failures is called for. We feel that the conservation of natural systems and habitats throughout America's waterways and coasts has not been a priority of the Corps through its planning and regulatory activities, and the Corps must now take the lead in preserving these resources.

Shore Protection

WRDA 2007 called for *“assessment methods that reflect the value of projects for low-income communities and projects that use nonstructural approaches to water resources development and management.”* The evaluation of nonstructural methods along the coastline must be incorporated into the evaluation of Storm Protection Projects. The goals of storm protection and flood avoidance may be accomplished by restoration of natural systems or by the relocation or removal of structures in harm's way. For the purposes of this letter Beach Nourishment is considered a “structural approach” as it is a ‘build’ alternative in the project evaluation. The construction of Beach Nourishment projects is hugely disruptive to coastal ecosystems and this damage very rarely evaluated or monitored sufficiently. P&G should require project planners to evaluate the potential use of ‘managed realignment’ to adjust communities to the changing nature of shorelines with the goal of allowing the natural system to provide storm protection.

Planning for shore protection must accommodate predicted changes in sea level caused by global climate change. Maintaining a shore line in a fixed position in perpetuity (as is the current goal of shore protection projects) is unwise and will be an enormous drain on taxpayer funds, given the predictions of rising ocean levels. The costs of maintaining a shoreline should fully incorporate the predicted rise by evaluating the actual volumes of sand needed to reach that goal. Clearly those costs will rise over time as erosion rates increase due to rising sea levels. These higher costs should then be evaluated against the true cost of maintaining the shore line in its natural state, while strategically “realigning” structures which might be put at risk.

Recreation

We believe that the full negative impacts of all shore protection projects to recreational activities need to be evaluated during planning. Surfing, fishing, diving and other water sports are impacted activities which bring economic resources to communities. Recent research has shown that surfing resources alone can bring millions of dollars into local economies. The economic impacts of damaging those resources, both short and long term, must be better evaluated and compensated for in determining a preferred plan which optimizes “sustainable economic development.”

Impacts to shoreline habitat can be devastating to fishing resources. The loss of intertidal and nearshore species, even temporary, has tremendous impacts on the ability of recreational shore fisherman to locate and catch their prey. These fishermen are often an important economic driver for

local economies, and impacts to their target resources can cause great economic and social strife to communities. Likewise diving resources (rock and reef habitat) have been shown to suffer tremendous impacts from Beach Nourishment projects, and the economic outfall of that must be more thoroughly and fairly evaluated.

Thank you for the opportunity to comment, please feel free to contact me for clarification or more information. We look forward to an expansion of the revision process and future opportunities to participate.

Sincerely,

Mark Rauscher
Assistant Environmental Director